

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

MUNA AL-SUYID, individually and on behalf of the estates of her family members ABDEL SALAM AL-SUYID, IBRAHIM AL-SUYID, KHALID AL-SUYID and MUSTAFA AL-SUYID, and ABDALLA AL-KRSHINY, AHMAD AL-KRSHINY, MAHMUD AL-KRSHINY, and IBRAHIM AL-KRSHINY, individually and on behalf of his family member ALI AL-KRSHINY and MUSTAFA AL-KRSHINY,

Plaintiffs,

V.

KHALIFA HIFTER,

Defendant.

Civil Action No.
1:20-cv-00170-LMB-JFA

SEPTEMBER 17, 2021

**PLAINTIFFS' MOTION TO COMPEL DISCOVERY FROM AND DEPOSITION OF
DEFENDANT KHALIFA HIFTER**

Pursuant to Federal Rule of Civil Procedure 37(a), Local Civil Rule 7(E) and Local Civil Rule 37, Plaintiffs Muna al-Suyid, individually and on behalf of her family members Abdel Salam al-Suyid, Ibrahim al-Suyid, Khalid al-Suyid and Mustafa al-Suyid, and Abdalla al-Krshiny, Ahmad al-Krshiny, Mahmud al-Krshiny and Ibrahim al-Krshiny, individually and on behalf of their family members Ali al-Krshiny and Mustafa al-Krshiny (collectively “Plaintiffs”), through their attorney, respectfully move this Court to compel Defendant Khalifa Hifter (“Defendant”) to produce pursuant to Plaintiffs’ First Set of Requests for Production and respond to Plaintiffs’ First Set of Interrogatories, both served on Defendant on July 22, 2021.

In support of this Motion to Compel, Plaintiffs submit their Memorandum of Law, dated September 17, 2021, filed simultaneously with this Motion: a Declaration of Kevin T. Carroll, attached as Exhibit A; a Proposed Order Granting Plaintiffs' Motion to Compel, attached as Exhibit B; Plaintiffs' Discovery Requests, attached as Exhibits C and D; Defendant's responses and objections to Plaintiffs' Requests for Production, attached as Exhibit E; counsel's e-mail correspondence, attached as Exhibit F; and Plaintiffs' notice of deposition for Defendant Khalifa Hifter, attached as Exhibit G.

Dated: September 17, 2021

Respectfully Submitted,
WIGGIN AND DANA LLP

By: /s/ Kevin T. Carroll

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CERTIFICATION

Pursuant to Rule 37(a)(1) of the Federal Rules of Civil Procedure and Local Civil Rule 37(E), undersigned counsel states that Plaintiffs' counsel has in good faith conferred with Defendant's counsel in an effort to resolve the issues raised in this motion but has been unable to reach a resolution without the judicial intervention of this Court.

/s/ Kevin T. Carroll

Kevin T. Carroll

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on September 17, 2021, I filed Plaintiffs' Motion to Compel with the Clerk of Court using the CM/ECF system, which will then send notification of such filing (NEF) to the following:

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/s/ Kevin T. Carroll
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Counsel for Plaintiffs